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January 24, 2020

VIA ECF & EMAIL

Hon. Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

Re: *Michelo et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al., 18-CV-1781 (PGG)*
Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al., 18-CV-7692 (PGG)

Dear Judge Gardephe:

We represent Plaintiffs in the above-referenced cases, and write jointly following consultation among all Parties, pursuant to Rule I.D of this Court's Individual Rules of Practice in Civil Cases.

Presently, the fact-discovery deadline in this consolidated litigation is January 31, 2020. See Consol. Am. Civ. Case Mgmt. Plan & Sched. Order ("CMP"), at ¶ 5 (*Bifulco* ECF No. 64; *Michelo* ECF No. 114) (entered June 11, 2019). After conferring, the Parties agree that this deadline must be extended in order to complete written and deposition discovery, which is underway, and due to unresolvable conflicts in the Parties' and counsels' schedules.

The Parties have previously requested, and been granted, extensions of the discovery deadline in this action on three separate occasions. (*Bifulco* ECF Nos. 35, 52, 54, 56–58, 60, 64; *Michelo* ECF Nos. 74, 97, 100, 104–106, 108, 114).

The Parties request that this Court replace the fact-discovery and other deadlines set forth in the current CMP, with those set forth in the proposed case management plan attached hereto.

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Respectfully submitted,

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